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Attorneys for Plaintiff

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

THOMAS E. PEREZ, United States Secretary
of Labor,

Plaintiff,

v.

ANIMAL CLINIC OF ALAMO, INC., a
corporation; DEBORAH KNIBB, an
individual; JOHN C. BAINE, III, an
individual; and the ANIMAL CLINIC
OF ALAMO PROFIT SHARING
PLAN, an employee pension benefit plan,

Defendants.

Case No.: 14-cv-00667-WHO

**STIPULATION AND ORDER RE:
EXTENSION OF CASE DEADLINES**

Pursuant to the Court's October 30, 2014 Order Continuing Trial and Other Dates, the discovery cutoff in this case is March 30, 2015. Dkt. No. 50. On February 12, 2015, Magistrate Judge Laurel Beeler set a further settlement conference for March 2, 2015. Dkt. No. 53. In order to provide the parties adequate time to engage in meaningful settlement discussions while preserving their ability to conduct sufficient discovery if they are unable to resolve this matter through the settlement conference process, the parties request and hereby stipulate to extend the

case deadlines in the Court's October 30, 2014 order by 60 days as follows:

Discovery cutoff (fact and expert): May 29, 2015

Expert disclosure: April 17, 2015

Rebuttal disclosure: May 8, 2015

Dispositive motions heard by: July 5, 2015

Pretrial Conference: August 28, 2015

Trial: September 11, 2015

AGREED:

M. PATRICIA SMITH
Solicitor of Labor

JANET M. HEROLD
Regional Solicitor

DANIELLE L. JABERG
Counsel for ERISA

IAN H. ELIASOPH
Counsel for ERISA

Dated: 2/19/2015

By: /s/ Benjamin Botts
BENJAMIN R. BOTTS
Trial Attorney
U.S. Department of Labor, Office of the Solicitor
Attorneys for Plaintiff Thomas E. Perez

Dated: 2/18/2015

/s/Robert Guite (as authorized 2/18/2015)
ROBERT GUITE
Sheppard Mullin, LLP
Settlement Attorney for Defendant Deborah Knibb

Dated: _____

JOHN BAINE III, Defendant in Pro Per

Dated: 2/13/2015

/s/William Thompson (as authorized 2/13/2015)
WILLIAM THOMPSON
Attorney for Third-Party Defendant David Berlier

ORDER

PURSUANT TO STIPULATION, **modified as follows**, the case schedule shall be:

Discovery cutoff (fact and expert): May 29, 2015

Expert disclosure: April 17, 2015

Rebuttal disclosure: May 8, 2015


Dispositive motions heard by: July 1, 2015

Pretrial Conference: August 24, 2015

Trial: September 21, 2015

IT IS SO ORDERED.

Dated: February 20, 2015


HONORABLE WILLIAM H. ORRICK
United States District Judge